

April 25, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02889

RE: Docket No. 4232 - Review of the Use of Backup Rates
National Grid's Opposition to TEC-RI's Motion to Dismiss

Dear Ms. Massaro:

On behalf of National Grid¹ enclosed are ten (10) copies of the Company's opposition to The Energy Council of Rhode Island's ("TEC-RI") Motion to Dismiss in the above-captioned proceeding.

Thank you for your attention to this transmission. If you have any questions please feel free to contact me at (401)784-7667.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. R. Teehan".

Thomas R. Teehan

cc: Docket 4232 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or the Narragansett Electric Company").

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been electronically transmitted, sent via U.S. mail or hand-delivered to the individuals listed below.



Joanne M. Scanlon

April 25, 2011

Date

**Docket No. 4232 - National Grid (NGrid) – Review of the Use of Backup Rates
Service List as of 4/15/11**

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND PUBLIC UTILITIES COMMISSION

National Grid
Use of Backup Rates

Docket No. 4232

National Grid's Opposition to TEC-RI's Motion to Dismiss

National Grid¹ hereby opposes TEC-RI's motion to dismiss the Company's petition requesting that the Commission establish a docket to consider the issue of whether electric backup rates should be continued, modified, or terminated. The Company's rationale for establishing a separate docket is already set forth in its petition. Because of the many policy issues that the Commission must consider when deciding the continued treatment of backup rates, the Company continues to believe that a full consideration of those issues will be best handled in a separate docket.

In the Revenue Decoupling Mechanism ("RDM") docket, there has been no significant discovery relative to backup rates. Within the RDM docket there have been only a handful of data requests that concerned backup rates. Moreover, the Company's request that TEC-RI's pre-filed testimony on backup rates be transferred into Docket 4232 was done to avoid any duplication of effort or other prejudice to TEC-RI. Administratively, it would be more reasonable to treat the use of backup rates in a comprehensive fashion rather than as part of the RDM proceeding. In that context, the basic purpose and benefits of backup rates can be weighed against the policy and benefits

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company").

of eliminating them, and the Commission also could consider the allocation among rate classes of lost revenues in the event the backup rates were altered or terminated.

In light of the foregoing, the Company respectfully requests that the Commission grant the Company's petition requesting a separate docket for the purpose of evaluating the continued and appropriate role of backup rates.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorney,



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